



## South Coast Air Quality Management District

### Engineering & Compliance

*Policies &  
Procedures*

#### South Coast Air Quality Management District Engineering and Compliance Coating, Printing and Aerospace

#### Memorandum

**DATE:** March 16, 1999  
**TO:** Coating, Printing, and Aerospace Staff  
**FROM:** Fred Lettice /s/ FL  
**SUBJECT:** BACT Determination for Fountain Solutions

The United States Environmental Protection Agency Region IX has informed us that BACT for a lithographic printing operation should include a VOC content limit of eight (8) percent by volume for fountain solutions. This limit is based on the Bay Area Air Quality Management District Rule 8-20-302 dated December 20, 1995, which specifies a VOC content of 8 percent by volume for fountain solutions.

Effective immediately, all permits for lithographic printing operations subject to new source review shall include a condition limiting the VOC content of the fountain solution to 8 percent by volume or less. Some high-end printers may have trouble complying with this limit when performing some printing techniques such as crossovers and reversals. If you have an applicant that can demonstrate that they require a higher VOC content fountain solution to print special applications, it is acceptable to allow a higher VOC content fountain solution to be used for those specific applications. The permit should contain a condition specifying the special applications and the fountain solution VOC limit for those specific applications as well as a condition limiting the VOC content of the fountain solution for all other applications to 8 percent by volume. Please notify your Senior AQ Engineer, AQACS, and me if you come across a need for a fountain solution VOC content greater than 8 percent by volume.

If you have any questions regarding this memo, please discuss them with your AQACS or me.

FEL

cc: Carol Coy  
Pom Pom Ganguli  
E and C Managers

BACTFSol

**RULE IMPLEMENTATION GUIDANCE  
REGULATION XIII: NEW SOURCE REVIEW**

**RE: Monthly Emission Limits**

**BACKGROUND**

In October 1990, NSR offset requirements were changed from "maximum daily" to "maximum monthly average." "Maximum daily" remains a criteria to determine BACT. Although Regulation XIII does not explicitly prescribe permit conditions, the 1990 amendments introduced the concept of a monthly emission limit. Permits issued through the community bank were typically issued with a monthly emission limit. Recordkeeping remained daily, as required by Rule 109.

In retrospect, these permits were issued without clear guidance on standard recordkeeping conditions for monthly limits. In addition, in the last five years, a few dozen companies have had pre-10/90 equipment permits with daily limits converted to monthly limits. No written procedure was issued for the conversion formula; and, many differences of opinion existed over this practice.

This rule implemented guidance provides direction on conversions from daily to monthly limits and issuance of new permits with monthly limits, as well as required standard permit conditions.

**MONTHLY EMISSION LIMITS**

**1. Conversion Formulas**

Permits with daily NSR limits may be converted to monthly NSR limits. Conversions may occur for permits issued both before and after the October 1990 amendments to Regulation XIII. If all legal requirements are met, conversions can be executed for individual pieces of equipment, or multiple equipment permits may be pooled and converted into a facility limit.

**A. Pre-10/90 Permits**

The following is the conversion formula for all pre-10/90 permits:

$$D_1 = \text{daily limits} = \text{maximum pounds/day}$$

$$\text{Convert by: } D_1 \times 30 = \text{monthly limit}$$

**January 21, 1997**

Note:

- (1) If the source provided offsets, and the monthly limit exceeds the amount previously offset are required.
- (2) If the source was exempt from offsets, and thus below the threshold level, no additional offsets are required. The emissions from these sources are recognized as minor sources (subject to growth) in the AQMP.

**B. Post-10/90 Permits**

Post-10/90 permits used maximum monthly emissions for offsets. Most of these permits have a monthly emission limit. For any post-10/90 permit with a daily limit, the conversion to a monthly limit would simply use the maximum monthly emissions data in the permit file per Regulation XIII.

**2. BACT and Toxics**

Sources converted from a daily limit to a monthly limit are subject to a new BACT evaluation, if the conversion will result in a one-pound (or greater) emission increase per day. In these cases, the source is also subject to an evaluation under Rule 1401.

Note:

- (1) In most cases, a BACT evaluation and air toxic evaluation will be required. A company could increase daily emissions once converted to a monthly limit.
- (2) If there is a new BACT for the source (considering cost effective threshold for small sources), or T-BACT (considering risk levels), then these controls would be required as a condition on the amended permit.

**3. Recordkeeping**

In addition to compliance with Rule 109, additional recordkeeping conditions are required in order to enforce a monthly limit. The following conditions shall be included on all permits with monthly limits, either for individual sources, a group of sources, or the facility as a whole.

**January 21, 1997**